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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB

**STIPULATION AND ~~PROPOSED~~ ORDER
REGARDING CERTAIN FACT SHEET
DEADLINES**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

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STIPULATION

WHEREAS, on March 19, 2024, the Court entered Pretrial Order No. 10, which states that “Plaintiffs will either submit bona fide ride receipts or the ride information detailed in PTO No. 5,” and that Plaintiffs shall serve either the bona fide ride receipt or Pretrial Order No. 5 information sheet “within 14 days of filing, transfer, or removal to this Court for all cases filed, transferred, or removed after February 1, 2024.” Mar. 19, 2024 Pretrial Order No. 10: Fact Sheet Implementation Order at 3, Dkt. 348. The Court also set the Plaintiff Fact Sheet and Defendant Fact Sheet deadlines for cases filed after March 26, 2024 as follows: “[E]ach Plaintiff must complete and submit a PFS and execute applicable Authorizations within 30 days of the case being filed in, removed to, or transferred to MDL 3084. The Uber Defendants must complete and submit a DFS and produce Responsive Documents, within 30 days after a given plaintiff serves the ride receipt or ride information form” *Id.* at 6;

WHEREAS, an extension of the deadline for the fact sheet submissions would provide more time to submit accurate fact sheets;

WHEREAS, the parties have agreed that the deadline to provide either a bona fide ride receipt or a Pretrial Order No. 5 information sheet for any Plaintiff represented by Cutter Law P.C. who joined the MDL by October 15, 2024 should be November 15, 2024;

WHEREAS, the parties have agreed that the deadline to provide a Plaintiff Fact Sheet for any Plaintiff represented by Cutter Law P.C. who joined the MDL by October 15, 2024 should be December 20, 2024;

WHEREAS, the parties have agreed that the deadline to provide a Defendant Fact Sheet for any Plaintiff represented by Cutter Law P.C. who joined the MDL by October 15, 2024 and who submits either a bona fide ride receipt or a Pretrial Order No. 5 information sheet by November 15, 2024 should be March 21, 2025;

WHEREAS, the parties have agreed that these deadlines may be subject to revision based on further discussion and agreement amongst the parties (or, in the absence of agreement, via application to the Court) about why changed circumstances (e.g., a significant additional volume of filings of cases by other law firms) may warrant further adjustment to the deadlines. Nothing

about this stipulation changes any obligations of the parties with respect to requirements set out in prior orders as to inclusion of the applicable authorizations/responsive documents.

THEREFORE, the parties respectfully request the Court enter the parties' stipulation establishing that:

1. Either a bona fide ride receipt or a Pretrial Order No. 5 information sheet for any Plaintiff represented by Cutter Law P.C. who joined the MDL by October 15, 2024 is due on November 15, 2024;
2. A Plaintiff Fact Sheet for any Plaintiff represented by Cutter Law P.C. who joined the MDL by October 15, 2024 is due on December 20, 2024;
3. A Defendant Fact Sheet for any Plaintiff represented by Cutter Law P.C. who joined the MDL by October 15, 2024 and submits either a bona fide ride receipt or a Pretrial Order No. 5 information sheet by November 15, 2024 is due on March 21, 2025; and
4. These deadlines may be subject to further revision, by agreement among the parties or by application to and approval of the Court, as described in the final WHEREAS clause above.

IT IS SO STIPULATED.

Dated: October 25, 2024

**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**

By: /s/ Kyle N. Smith

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UBER TECHNOLOGIES, INC.,
RASIER, LLC, and RASIER-CA, LLC

1 Dated: October 25, 2024

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FILER'S ATTESTATION

I, Randall S. Luskey, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: October 25, 2024

By: /s/ Randall S. Luskey
Randall S. Luskey

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7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 SAN FRANCISCO DIVISION
10

11 IN RE: UBER TECHNOLOGIES, INC.,
12 PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

~~PROPOSED~~ ORDER REGARDING
CERTAIN FACT SHEET DEADLINES

13 This Document Relates to:
14 ALL ACTIONS
15

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17 The Court hereby GRANTS the parties' stipulation as follows:

- 18 1. A bona fide ride receipt or Pretrial Order No. 15 information sheet for any Plaintiff
19 represented by Cutter Law P.C. who joined the MDL by October 15, 2024 is due on
20 November 15, 2024.
- 21 2. A Plaintiff Fact Sheet for any Plaintiff represented by Cutter Law P.C. who joined
22 the MDL by October 15, 2024 is due on December 20, 2024.
- 23 3. A Defendant Fact Sheet for any Plaintiff represented by Cutter Law P.C. who joined
24 the MDL by October 15, 2024 and submits either a bona fide ride receipt or a Pretrial
25 Order No. 5 information sheet by November 15, 2024 is due on March 21, 2025.
- 26 4. These deadlines may be subject to further revision, by agreement among the parties
27 or by application to and approval of the Court, as described in the final WHEREAS
28 clause of the parties' stipulation.

- 7 -

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: November 8, 2024

HON. CHARLES R. BREYER
UNITED STATES DISTRICT COURT

